

EXHIBIT 1

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11 UNITED STATES DISTRICT COURT
 12 SOUTHERN DISTRICT OF CALIFORNIA

13 CARLOS VICTORINO and ADAM
 14 TAVITIAN, individually, and on
 15 behalf of other members of the
 general public similarly situated,

16 Plaintiffs,

17 v.

18 FCA US LLC, a Delaware limited
 19 liability company,

20 Defendant.

Case No.: '16CV1617 GPC JLB

**DECLARATION OF CARLOS
 VICTORINO IN SUPPORT OF
 VENUE FOR CLASS ACTION
 COMPLAINT PURSUANT TO
 CIVIL CODE SECTION 1780(d)**

1 **DECLARATION OF CARLOS VICTORINO**

2 I, Carlos Victorino, declare under penalty of perjury as follows:

3 1. I make this declaration based upon my personal knowledge except
4 as to those matters stated herein that are based upon information and belief, and
5 as to those matters I believe them to be true. I am over the age of eighteen, a
6 citizen of the State of California, and a Plaintiff in this action.

7 2. Pursuant to California Civil Code section 1780(d), this Declaration
8 is submitted in support of Plaintiff's Selection of Venue for the Trial of
9 Plaintiffs' Cause of Action alleging violation of California's Consumers Legal
10 Remedies Act.

11 3. I reside in Chula Vista, California, which is in the County of San
12 Diego. I keep my vehicle, which is the subject of this lawsuit, at my home in
13 Chula Vista. I also service my vehicle in the County of San Diego.

14 4. I am informed and believe that Defendant FCA US LLC
15 ("Defendant") is a Delaware limited liability company, organized and existing
16 under the laws of the State of Delaware, and registered to conduct business in
17 California. Defendant FCA US LLC's Corporate Headquarters are located at
18 1000 Chrysler Drive, Auburn Hills, Michigan 48326. On information and belief,
19 Defendant conducts business in San Diego County, including marketing,
20 distributing, selling, and servicing vehicles through its authorized dealerships.

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Executed on June 24, 2016 in Chula Vista, California.

DocuSigned by:
Carlos Victorino
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Carlos Victorino